

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF PUTNAM

SUMMONS

MILTON EMORY EDWARDS and MICHELLE A.
CAMPBELL-EDWARDS

Plaintiffs,
-against-

JENNIFER L. COX and THE DEVEREUX
FOUNDATION,

Defendants.

Index No.:
Date Purchased/Filed:

Plaintiff designates Putnam
County as the place of trial.

The basis of the venue is:
Place of occurrence

Plaintiffs resides at:
92 Roger Street
Hartford, CT 06106

To the above-named defendants,

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiffs' attorney within 30 days after the service of this summons, exclusive of the day of service; and in case of your failure to appear or answer judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
May 11, 2022

/s/ Gennady Voldz
Gennady Voldz,
MORGAN & MORGAN NY PLLC
350 Fifth Avenue Ste. 6705
New York, NY 10018
(212) 738-6299

Defendant's addresses:

JENNIFER L. COX
134 Chapel Hill Road
Highland, New York 12528

THE DEVEREUX FOUNDATION
c/o Phelan, Phelan & Danek LLP
302 Washington Avenue Ext., Suite 3
Albany, New York 12203

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF PUTNAM

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CAMPBELL-EDWARDS,

Plaintiffs,

-against-

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Defendants.

Index No.:

**VERIFIED
COMPLAINT**

Plaintiffs, by and through their attorneys, **Morgan and Morgan New York PLLC**, complaining of the defendants herein, respectfully shows to the Court, and alleges as follows upon information and belief:

**AS AND FOR A FIRST CAUSE OF ACTION FOR PLAINTIFF
MILTON EMORY EDWARDS**

1. That at all times hereinafter mentioned, plaintiff, MILTON EMORY EDWARDS, was, and still is, resident of the State of Connecticut, maintaining a residence at 92 Roger Street, Hartford, CT 06106
2. That at all times hereinafter mentioned, defendant, JENNIFER L. COX was, and still is, a resident of the State of New York, maintaining a residence at 134 Chapel Hill Road, Highland, New York 12528.
3. That at all times herein mentioned, defendant, THE DEVEREUX FOUNDATION, was and still is a foreign not-for-profit corporation existing under the laws of the State of New York, with an office located at 40 Devereux Way, Red Hook, New York 12571 and duly licensed to conduct business in the State of New York.

4. Defendant, JENNIFER L. COX, was the driver and operator of a motor vehicle bearing State of New York plate number HRV1973.

5. Defendant, JENNIFER L. COX, was in physical charge, operation, management, and control of the aforesaid vehicle owned by the defendant THE DEVEREUX FOUNDATION, with the knowledge, consent, and permission, either express or implied, of the defendant owner thereof.

6. That at all times hereinafter mentioned and on the 29th day of November, 2021, defendant, THE DEVEREUX FOUNDATION, was an owner, as defined in the Vehicle and Traffic Law Sec.128, of a certain motor vehicle known as a 2017 Dodge Suburban bearing New York State plate number HRV1973.

7. That at all times hereinafter mentioned and on November 29, 2021, the plaintiff, MILTON EMORY EDWARDS, was the driver and operator of a certain motor vehicle known as a 2021 Toyota bearing Connecticut State license plate number AU93415.

8. That on November 29, 2021, the plaintiff, MILTON EMORY EDWARDS, was the driver and operator of said motor vehicle bearing Connecticut plate number AU93415 upon the Town of Southeast, County of Putnam, State of New York.

9. That on November 29, 2021, the defendant, JENNIFER L. COX, was the driver and operator of said motor vehicle bearing New York State plate number HRV1973 upon the Town of Southeast, County of Putnam, State of New York.

10. That on November 29, 2021 the defendant's aforesaid vehicle came into contact with plaintiffs' motor vehicle on Interstate 84, 1 mile west of I-684 in the Town of Southeast.

11. That the aforesaid collision and injuries resulting therefrom, were due to the careless and negligent manner in which the defendant operated and controlled their said motor vehicle without the plaintiffs in any way contributing thereto.

12. That by reason of the foregoing and the negligence of the said defendant, the plaintiff sustained serious, severe and permanent injuries to his neck, back, limbs and body, still suffers and will continue to suffer for some time, great physical and mental pain and serious bodily injury; became sick, sore, lame and disabled and so remained for a considerable length of time.

13. That by the reason of the foregoing and the negligence of the said defendant, the plaintiff was informed and verily believes that the aforesaid injuries are permanent and that he will permanently suffer from the effects of the aforesaid injuries and that he will be caused to suffer continuous pain and inconvenience.

14. That by reason of the foregoing, the plaintiff was compelled and did necessarily require medical aid and attention and did necessarily pay and become liable therefore, for medicines and other related medical expenses and upon information and belief, the plaintiff will necessarily incur similar expenses.

15. That the plaintiff sustained serious injuries as defined in the Insurance Law of the State of New York Section 5102 and has sustained economic loss greater than basic economic loss as defined in the Insurance Law of the State of New York Section 5102.

AS AND FOR A SECOND CAUSE OF ACTION OF PLAINTIFF
MICHELLE A. CAMPBELL-EDWARDS

16. Plaintiffs repeats, reiterates, and re-alleges each and every allegation contained in paragraphs "01" through "15", inclusive, with the same force and affect as though the same were more fully set forth at length herein.

17. That at all times hereinafter mentioned, plaintiff, MICHELLE A. CAMPBELL-EDWARDS was, and still is, resident of the State of Connecticut maintaining a residence at 92 Roger Street, Hartford, Connecticut 06106.

18. That at all times hereinafter mentioned and on November 29, 2021, the plaintiff, MICHELLE A. CAMPBELL-EDWARDS, was a passenger and owner in the aforesaid motor vehicle bearing Connecticut State license plate number AU93415.

19. That the aforesaid collision and injuries resulting therefrom, were due to the careless and negligent manner in which the defendant operated and controlled their said motor vehicle without the plaintiffs in any way contributing thereto.

20. That by reason of the foregoing and the negligence of the said defendant, the plaintiff sustained serious, severe and permanent injuries to her head, neck, back, limbs and body, still suffers and will continue to suffer for some time, great physical and mental pain and serious bodily injury; became sick, sore, lame and disabled and so remained for a considerable length of time.

21. That by the reason of the foregoing and the negligence of the said defendant, the plaintiffs were informed and verily believes that the aforesaid injuries are permanent and that she will permanently suffer from the effects of the aforesaid injuries and that she will be caused to suffer continuous pain and inconvenience.

22. That by reason of the foregoing, the plaintiff was compelled and did necessarily require medical aid and attention and did necessarily pay and become liable therefore, for medicines and other related medical expenses and upon information and belief, the plaintiff will necessarily incur similar expenses.

23. That the plaintiff sustained serious injuries as defined in the Insurance Law of the State of New York Section 5102 and has sustained economic loss greater than basic economic loss as defined in the Insurance Law of the State of New York Section 5102.

**AS AND FOR A THIRD CAUSE OF ACTION ON BEHALF
OF PLAINTIFF MICHELLE A. CAMPBELL-EDWARDS**

24. Plaintiffs repeats, reiterates, and re-alleges each and every allegation contained in paragraphs "01" through "23", inclusive, with the same force and affect as though the same were more fully set forth at length herein.

25. That defendants so carelessly and negligently operated their aforesaid motor vehicle so as to cause the aforesaid contact.

26. That as a result of the foregoing, this plaintiff's aforesaid vehicle was caused to and did sustain property damage and this plaintiff was required to seek and obtain mechanical attention in an effort to repair the damage.

27. That the aforesaid occurrence and property damage sustained by this plaintiff's vehicle was caused by the negligence of the defendant and not by any act or omission on the part of this plaintiff contributing thereto.

28. That by reason of the foregoing, plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

WHEREFORE plaintiff, MILTON EMORY EDWARDS, demands judgement against the defendants JENNIFER L. COX and THE DEVEREUX FOUNDATION, in the FIRST Cause of Action and plaintiff, MICHELLE A. CAMPBELL-EDWARDS, demands judgment against the defendants, JENNIFER L. COX and THE DEVEREUX FOUNDATION, on the SECOND and THIRD Cause of Action, in an amount to be determined at the time of trial, together with the costs and disbursements of this action.

Dated: New York, New York
May 11, 2022

Respectfully Submitted,

/s/ Gennady Voldz
GENNADY VOLDZ
MORGAN & MORGAN NY PLLC
350 Fifth Avenue Suite 6705
New York, New York 10018
(212)738-6299

ATTORNEY VERIFICATION

GENNADY VOLDZ, an attorney duly licensed to practice in the courts of the State of New York, hereby affirms the following under penalties of perjury:

That I am associated with the law firm of **MORGAN & MORGAN NY, PLLC** attorneys for the plaintiff in the within action; that I have read the foregoing **SUMMONS AND VERIFIED COMPLAINT** and know the contents thereof; and that the same is true to my own knowledge, except as to the matters therein alleged to be on information and belief, and as to those matters, I believe them to be true. The reason this Verification is made by me and not by the plaintiff is that said plaintiff resides outside of the County in which the Affirmand's office is located.

The grounds of my belief as to all matters stated upon my own knowledge are as follows: the records, reports, contracts, and/or documents contained in the plaintiff's file.

/s/ Gennady Voldz
GENNADY VOLDZ, ESQ.
MORGAN & MORGAN

Affirmed: May 11, 2022
New York, New York 10018